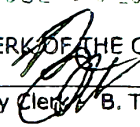


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FILED
San Francisco Superior Court
JUL 30 2025
CLERK OF THE COURT
By  Deputy Clerk B. Thompson

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 CITY AND COUNTY OF SAN FRANCISCO

13 PEOPLE OF THE STATE OF CALIFORNIA,
14
15 Plaintiff,
16
17 vs.
18 SEAN COLLINS,
19 Defendant(s).

Case Nos. 25016166

NOTICE OF MOTION AND MOTION
TO DETAIN

Date: July 30, 2025
Time: 1:30 p.m.
Dept.: 10

21 PLEASE TAKE NOTICE that the District Attorney hereby moves the Court to detain
22 Defendant. The motion will be based on the records of this Court, the authorities and declaration
23 below, and upon such other evidence as may be presented at the time of the hearing.

24 Date: July 30, 2025

BROOKE JENKINS
District Attorney

Melissa Demetral

Melissa Demetral
Assistant District Attorney
Attorneys for the People

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1 ultimately took him down to the bench of seats on the platform. A few seconds later, the Victim can
2 be seen bleeding profusely from the right side of his neck as his body suddenly stopped moving.

3 applied pressure to the Victim's neck as she called 911. It was then that the Defendant
4 became free to move.

5 Recognizing what he had just done, the Defendant fled the scene, but not without inflicting
6 more harm and cruelty to those innocent civilians that surrounded him. As he fled, the Defendant
7 exhibited his knife to a mother as she ushered her two children (both witnesses to the homicide)
8 away from the scene. The Defendant then proceeded to take off his green sweater and discard it on
9 the street. He also got rid of the knife to distance himself from the horrific thing he had just done.
10 SFPD officers arrived on scene and detained the Defendant a few blocks away from the incident.
11 The Defendant was covered in blood. They also recovered the bloodied knife and sweater in his
12 flight path.

13 Given that the homicide occurred in the middle of the day on a very public street, there are
14 many witnesses as well as video evidence of the incident. In fact, SF MUNI surveillance captures
15 the entire homicide. Two of the eyewitnesses to this incident are the other Victims in this case, Jane
16 Doe 1 and Jane Doe 2. Jane Doe 1 is fourteen years old, and Jane Doe 2 is eight years old. They
17 were within feet of the Defendant when he stabbed the Victim. Jane Doe 1 stated she observed the
18 Defendant stab the Victim multiple times. She said that prior to the stabbing, no words were
19 exchanged between the Defendant and Victim. In fact, the attack was completely unprovoked. The
20 Victim was transported to SFGH where he would later die because of the stab wound. He was just
21 twenty-eight years old.

22 The Statement of Facts, above, is based upon the following documents and/or evidence,
23 which the People ask that the Court consider in ruling on this motion. (*In re Harris* (2024) 16
24 Cal.5th 292, 318-319 [trial court may consider a proffer based on reliable evidence].) These
25 documents and/or evidence have been provided in discovery to the defense and are either in the
26 possession of the Court or will be provided to the Court for its consideration:

27 Incident Report Number (date & number of pages): 22 pages (Exhibit 1)

28 Chronological of Investigation (number of pages & date of last entry):

Rap Sheet(s): 1 page (Exhibit 2)

Photo(s)/Video(s) (date/time & number of photos or video length): MUNI video 1 minute 24 seconds (Exhibit 3)

Other (describe):

ARGUMENT

I. The Court Should Detain Defendant Pending Trial on the Following Grounds:

☒ Without bail under Article I, section 12 of the California Constitution because: (1) the facts are evident and the presumption great that Defendant committed one of the enumerated offenses listed in section 12; AND

(2) clear and convincing evidence shows that (a) there is a substantial likelihood that Defendant's release would result in either great bodily injury to others; and/or (b) Defendant threatened others with great bodily injury and there is a substantial likelihood that Defendant would carry out the threat if released (*In re White* (2020) 9 Cal.5th 455); AND

By clear and convincing evidence, less restrictive conditions of release cannot reasonably satisfy the compelling government interests of protecting public and victim safety or ensuring Defendant's appearance in court. (*In re Harris* (2021) 71 Cal.App.5th 1085, rev. granted Mar. 9, 2022, S272632.)

☒ Under *In re Humphrey* (2021) 11 Cal.5th 135 because the facts are evident and clear and convincing evidence shows a substantial likelihood that Defendant's release on less restrictive conditions cannot reasonably satisfy the compelling government interests of protecting public and victim safety and/or ensuring Defendant's appearance in court.

☐ For Defendant's felony probation matter, find by clear and convincing evidence that the particular circumstances of the case require the Court to impose an order to detain in order to reasonably protect public safety and/or reasonably assure Defendant's future appearance in court. (See Pen. Code, §§ 1272.1, 1203.25.)